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(additional counsel on Exhibit A)

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**AMENDED SECURITIES LEAD
PLAINTIFF'S EXHIBIT LIST FOR
CONFIRMATION HEARING**

Public Employees Retirement Association of New Mexico (“**Lead Plaintiff**”), the court-appointed lead plaintiff in the securities class action captioned as *In re PG&E Corporation Securities Litigation*, Case No. 18-03509 (the “**Securities Litigation**”) pending in the United States District Court for the Northern District of California (the “**District Court**”), on behalf of itself and the class that it seeks to represent in the Securities Litigation (the “**Class**”),¹ together with York County on behalf of the County of York Retirement Fund, City of Warren Police and Retirement System, and Mid-Jersey Trucking Industry & Local No. 701 Pension Fund (collectively with Lead Plaintiff the “**Securities Plaintiffs**”) hereby submit this Amended Exhibit List (the “**Exhibit List**”) for the hearing to begin on May 27, 2020 at 10:00 am (prevailing Pacific Time) (the “**Confirmation Hearing**”) regarding confirmation of the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated March 16, 2020* [ECF No. 6320] (the “**Plan**”) of the debtors in possession (the “**Debtors**”) in the above-captioned chapter 11 bankruptcy cases (the “**Chapter 11 Cases**”), in support of Securities Plaintiffs’ objection to confirmation of the Plan (the “**Objection**”):

EXHIBITS

No.	Description
SP-001	Lead Plaintiff’s First Set of Document Demands to the Debtors in Connection with Confirmation of the Plan
SP-002	Email from Richard Slack to Randy Michelson, dated 5/14/2020 10:09 PM, re: Document Requests

¹ On February 27, 2019, the Court entered an order denying Securities Plaintiffs’ motion to apply Bankruptcy Rule 7023 to the claims Lead Plaintiff filed on behalf of the Class. Securities Plaintiffs timely appealed from that order and their appeal remains pending in the District Court. Nevertheless, the issues raised in this Objection apply equally to Securities Plaintiffs individually, who also timely filed individual proofs of claim in these Chapter 11 Cases and to the members of the Class. In addition, as the court-appointed lead plaintiff in the Securities Litigation, Lead Plaintiff remains a fiduciary for Class members. *See, e.g., Eubank v. Pella Corp.*, 753 F.3d 718, 723-24 (7th Cir. 2014) (“Class representatives are . . . fiduciaries of the class members. . . .”); *Schick v. Berg*, 2004 WL 856298, *4 (S.D.N.Y. Apr. 20, 2004) (“The general rule is that the named plaintiff and counsel bringing the action stand as fiduciaries for the entire class, commencing with the filing of a class complaint.”); *cf. In re Gen. Motors Corp. Pick-Up Truck Fuel Tank Prod. Liab. Litig.*, 55 F.3d 768, 801 (3d Cir. 1995) (“Beyond their ethical obligations to their clients, class attorneys, purporting to represent a class, also owe the entire class a fiduciary duty once the class complaint is filed.”).

1	SP-003	Email from Randy Michelson to Richard Slack, dated 5/18/2020 2:25 PM, re: Document Requests
2	SP-004	<i>Memorandum in Opposition to Officer Defendants' Motion to Dismiss Third Amended Consolidated Class Action Complaint</i> , Case No. 5:18-cv-03509-EJD, Docket No. 160, including <i>Appendix A</i> , Docket No. 160-1
3		
4	SP-005	<i>Plaintiffs' Opposition to the Defendant Directors and Underwriters' Motion to Dismiss Third Amended Complaint and the Officer Defendants' Joinder of Said Motion</i> , Case No. 5:18-cv-03509-EJD, Docket No. 161
5		
6	SP-006	<i>Plaintiff's (1) Opposition to Officer Defendants' Request for Judicial Notice and (2) Cross-Request for Judicial Notice</i> , Case No. 5:18-cv-03509-EJD, Docket No. 162
7		
8	SP-007	<i>Declaration of Louis Gottlieb in Support of Plaintiff's (1) Opposition to Officer Defendants' Request for Judicial Notice and (2) Cross-Request for Judicial Notice (with attached Exhibits)</i> , Case No. 5:18-cv-03509-EJD, Docket No. 164)
9		
10	SP-008	The daily opening and closing prices of PG&E Corp. common stock (PCG) on the Petition Date, January 29, 2019
11		
12	SP-009	Report listing the trading volume of the Debtors' stock between November 15, 2018 and the July 1, 2019 Record Date, retrieved from https://finance.yahoo.com/quote/PCG/key-statistics?p=PCG and attached as Exhibit 1 to <i>Declaration of Andrew D. Behlmann, Esq. in Support of Securities Lead Plaintiff's Reply in Further Support of Motion to Apply Bankruptcy Rule 7023 to Class Proof of Claim</i> , ECF No. 5458-1
13		
14		
15		
16	SP-010	<i>Notice of Extended Deadline for Filing Certain Securities Claims for Rescission or Damages</i> , ECF No. 5943-2

DESIGNATION OF SPEAKING ATTORNEYS AT CONFIRMATION HEARING

In accordance with the *Order Establishing Confirmation Hearing Protocol* [ECF No. 7182], Lead Plaintiff and the Securities Plaintiffs have previously provided notice via email the following parties may appear, speak on behalf of, and cross-examine witnesses on behalf of Lead Plaintiff and the Securities Plaintiffs at the Confirmation Hearing: Michael S. Etkin (metkin@lowenstein.com) and Andrew D. Behlmann (abehlmann@lowenstein.com) of Lowenstein Sandler, LLC, Thomas Dubbs (tdubbs@labaton.com) and Jeffrey Dubbin (jdubbin@labaton.com) of Labaton Sucharow, and Randy Michelson (randy.michelson@michelsonlawgroup.com) of Michelson Law Group.

RESERVATION OF RIGHTS

The Securities Plaintiffs reserve the right to (a) amend or supplement the foregoing Exhibit List at any time prior to the Confirmation Hearing; (b) use additional exhibits for purposes of rebuttal or impeachment; (c) rely upon and use as evidence (i) additional documents produced by any party, (ii) exhibits included on the exhibit list of any other party, and (iii) any pleading, hearing transcript, order, or other document filed with or by the Court in the Chapter 11 Cases; and/or (d) request that the Court take judicial notice of any pleadings, hearing transcripts, orders, or other documents filed in the Chapter 11 Cases, and/or the Securities Litigation.

Dated: May 25, 2020

Respectfully submitted,

**LOWENSTEIN SANDLER LLP
MICHELSON LAW GROUP**

By: /s/ Randy Michelson
Randy Michelson (SBN 114095)

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- and -

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- and -

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- and -

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Counsel for the Securities Act Plaintiffs

- and -

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